- 1		
1	ROBERT W. FREEMAN	
2	Nevada Bar No. 3062 Robert.Freeman@lewisbrisbois.com	
	E. MATTHEW FREEMAN	
3	Nevada Bar No 14198 Matt.Freeman@lewisbrisbois.com	
4	LEWIS BRISBOIS BISGAARD & SMITH LLP	
5	6385 S. Rainbow Boulevard, Suite 600 Las Vegas, Nevada 89118	
6	702.893.3383 FAX: 702.893.3789	
	Attorneys for Defendant	
7	City of Henderson, Nevada Henderson Police Department and	
8	Chief Thedrick Andres	
9		
10	UNITED STATES DISTRICT COURT	
11	DISTRICT OF NEVADA	
12		
		CDS
13	MICHAEL LEWIS, Individually and as Administrator of the Estate of KEVIN LEWIS,	CASE NO. 2:21-ev-1128 -APG -VCF
14	Deceased; MICHAEL LEWIS as Guardian Ad Litem of LUKE ARTHUR LEWIS, a minor,	STIPULATION AND ORDER TO EXTEND THE DEADLINE TO FILE
15	and EMBER LYNN LEWIS, a minor, as heirs	DISPOSITIVE MOTIONS
16	of the Estate of KEVIN LEWIS, Deceased,	FIRST REQUEST
17	Plaintiff	
	vs.	
18	CITY OF HENDERSON, NEVADA, a	
19	political subdivision of the State of Nevada: HENDERSON POLICE DEPARTMENT, a	
20	political subdivision of the State of Nevada;	
21	THEDRICK ANDRES, individually and as policy maker and Chief of CITY OF	
22	HENDERSON POLICE DEPARTMENT; DOE HENDERSON POLICE OFFICERS I	
	through X; LAS VEGAS METROPOLITAN	
23	POLICE DEPARTMENT, a political subdivision of the State of Nevada; SHERIFF	
24	JOE LOMBARDO, individually and as policy maker of LAS VEGAS METROPOLITAN	
25	POLICE DEPARTMENT; DOE LAS VEGAS	
26	METROPOLITAN POLICE DEPARTMENT OFFICERS, I through X; DOES I through X;	
27	and ROE ENTITIES, I through X, inclusive,	
28	Defendants	
/ 💉	, ·	

LEWIS BRISBOIS BISGAARD & SMITH LLP ATTORNEYS AT AW

130832329.1

STIPULATION AND ORDER TO EXTEND THE DEADLINE TO FILE DISPOSITIVE MOTIONS - FIRST REQUEST

Pursuant to EDCR 2.35, the parties, by and through their respective counsel of record, hereby stipulate and request that this Court extend the deadline to file dispositive motions in the abovecaptioned case thirty (30) days, up to and including Thursday, December 7, 2023.

This Request for an extension of time is not sought for any improper purpose or other purpose of delay. This request for extension is based upon the following:

Due to the size and complexities of the issues in the case, Defendants City of Henderson, et al. seek additional time to time file their dispositive motion.

WHEREFORE, the parties respectfully request that this Court extend the time for the parties to file their dispositive motions by thirty (30) days from the current deadline of November 7, 2023 up to and including December 7, 2023.

Dated this 17th day of October, 2023.

CLARK HILL, PLLC

/s/ Timothy R. O'Reilly TIMOTHY R. O'REILLY, CHTD TIMOTHY R. O'REILLY Nevada Bar No. 8866 TRACIE M. JEFCIK Nevada Bar No. 15575 325 S. Maryland Parkway Las Vegas, Nevada 89101 PAOLA M. ARMENI

Nevada Bar No. 8327 3800 Howard Hughes Pkwy., Suite 500 Las Vegtas, Nevada 89169

GERALD I. GILLOCK & ASSOCIATES GERALD I. GILLOCK Nevada Bar No. 51 ALEXANDER J. SMITH Nevada Bar No. 14502 428 South Fourth Street Las Vegas, Nevada 89101

Attorneys for Plaintiffs

10 11 12 Dated this 17th day of October, 2023. 13 LEWIS BRISBOIS BISGAARD & SMITH LLP 14 15 /s/ Robert W. Freeman ROBERT W. FREEMAN 16 Nevada Bar No. 3062 E. MATTHEW FREEMAN 17 Nevada Bar No 14198 18 6385 S. Rainbow Blvd., Suite 600 Las Vegas, Nevada 89118 19 Attorney for Defendants City of Henderson, Nevada 20 Henderson Police Department and Chief Thedrick Andres 21 22 23 24 25 26 27 28

1

2

3

4

5

6

7

8

9

2 130832329.1

1	Dated this 17 th day of October, 2023.	
2	KAEMPFER CROWELL	
3	/s/ Lyssa S. Anderson	
4	LYSSA S. ANDERSON Nevada Bar No. 5781	
5	RYAN W. DANIELS	
6	Nevada Bar No. 13094 KRISTOPHER J. KALKOWSKI	
7	Nevada Bar No. 14892 1980 Festival Plaza Drive, Suite 650	
8	Las Vegas, Nevada 89135 Attorneys for Defendants	
9	LVMPD and Sheriff Joseph Lombardo	
10		
11	<u>ORDER</u>	
12	Based on the stipulation of the parties, IT IS ORDERED that the deadline to file	
13	dispositive motions is extended up to and including December 7, 2023.	
14		
15	I DUTTED OT A TEG DISTRICT HIDGE	
16	UNITED STATES DISTRICT JUDGE	
17	Dated: October 18, 2023	
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		

3

LEWIS
BRISBOIS
BISGAARD
& SMITH LIP
ATTORNEYS AT AW

130832329.1